

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
 )  
Plaintiff, )  
 ) Civil Action  
v. ) No. 05-00697-SLR  
 )  
BE&K ENGINEERING COMPANY )  
(SUBSIDIARY OF BE&K, INC.), )  
 )  
Defendant. )

Deposition of JACK R. BAKER taken pursuant to notice at the law offices of Young, Conaway, Stargatt & Taylor, 1000 West Street, Wilmington, Delaware, beginning at 9:20 a.m. on May 1, 2006, before Vincent J. Bailey, Registered Professional Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ., TRIAL ATTORNEY,  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Philadelphia District Office - The Bourse  
111 S. Independence Mall East - Suite 400  
Philadelphia, Pennsylvania 19106-2515  
For the Plaintiff

MARGARET M. DiBIANCA, ESQ.  
YOUNG, CONAWAY, STARGATT & TAYLOR  
1000 West Street,  
Wilmington, Delaware 19801  
For the Defendant

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477



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COPY

Jack R. Baker

110

1 A. February of '04 -- three or four months after  
2 that I think.

3 Q. After Mr. Perez was laid off?

4 A. Yes.

5 Q. Okay. So that was February of 2004?

6 A. Yes.

7 Q. He actually started working at BE&K in July of  
8 2003?

9 A. Okay.

10 Q. You don't know?

11 A. Maybe. I don't know what month. That's very  
12 possible.

13 Q. But at the time Mr. Perez was laid off, no one  
14 had made a comment like that about Chris Guttridge's  
15 performance?

16 A. That's right.

17 MR. ANGLADE: No further questions. We will  
18 read.

19 (The deposition concluded at 1:15 p.m.)  
20  
21  
22  
23  
24



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
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Plaintiff, )  
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v. ) No. 1:05-cv-00697-SLR  
 )  
BE&K ENGINEERING COMPANY )  
(SUBSIDIARY OF BE&K, INC.), )  
 )  
Defendants. )

Deposition of ROBERT J. SHOEMAKER taken pursuant to notice at the law offices of Young Conaway Stargatt & Taylor, 1000 West Street, 17th Floor, Wilmington, Delaware, beginning at 12:50 p.m. on Tuesday, May 9, 2006, before Lucinda M. Reeder, Registered Diplomat Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ.  
Equal Employment Opportunity Commission  
Philadelphia District Office  
21 South 5th Street, Suite 400  
Philadelphia, Pennsylvania 19106  
for the Plaintiff

MARGARET M. DiBIANCA, ESQ.  
Young Conaway Stargatt & Taylor  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801  
for the Defendant

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ORIGINAL

Robert J. Shoemaker

110

1 Chris Guttridge?

2 A. There were.

3 Q. Do you know if some of the people working on  
4 the project were more experienced than him?

5 A. Yes.

6 Q. Do you know if the engineers working on that  
7 project were doing the same type of work?

8 A. They weren't doing the same type of work. Some  
9 of those relief calculations require senior people,  
10 and they would set the problems up, I am sure, for  
11 Chris. They would assign the easier things for an  
12 entry level engineer.

13 Q. Do you know if they were working on the same  
14 type of assignments?

15 A. I don't know.

16 MR. ANGLADE: I have no further questions.

17 MS. DiBIANCA: I am done. We'll read.

18 (Deposition concluded at 3:48 p.m.)

19 -- -- -- --  
20 I N D E X

21 WITNESS: DANIEL M. DAYTON

PAGE

22 EXAMINATION BY ANGLADE

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23 EXAMINATION BY MS. DiBIANCA

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24 EXAMINATION BY MR. ANGLADE

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF DELAWARE

3 EQUAL EMPLOYMENT )  
4 OPPORTUNITY COMMISSION, )  
5 )  
6 Plaintiff, )  
7 ) Civil Action  
8 v. ) No. 05-697 (KAJ)  
9 )  
10 BE&K ENGINEERING COMPANY, )  
11 )  
12 Defendant. )

13 Deposition of JOHN TREXLER taken pursuant to  
14 notice at the law offices of Young, Conaway, Stargatt  
15 & Taylor, The Brandywine Building, 1000 West Street,  
16 17th Floor, Wilmington, Delaware, beginning at  
17 9:13 a.m. on Wednesday, June 21, 2006, before  
18 Lucinda M. Reeder, RDR, CRR and Notary Public.

19 APPEARANCES:

20 WOODY ANGLADE, ESQ.  
21 U.S. Equal Employment Opportunity Commission  
22 Philadelphia District Office  
23 21 South 5th Street, Suite 400  
24 Philadelphia, Pennsylvania 19106-2515  
for the Plaintiff,

MARGARET M. DiBIANCA, ESQ.  
Young, Conaway, Stargatt & Taylor  
The Brandywine Building,  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801  
for the Defendant.

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John Trexler

220

1 A. Right here "pharmaceutical experience not  
2 strictly necessary."

3 Q. Could you read the context in which that's in?

4 A. Yes.

5 Q. Just for the record because it won't be clear  
6 in the record.

7 A. It says --

8 Q. "Train young" --

9 A. -- "train young engineers. Pharmaceutical  
10 experience not strictly necessary, two to three  
11 engineers initially."

12 Q. "Experience not strictly necessary"?

13 A. That's right.

14 Q. That leads you to what conclusion?

15 A. That it's a good training opportunity for --  
16 you know, it's a good opportunity for engineers that  
17 don't have good background in the industry.

18 Q. Is there any reason that it would not be a good  
19 opportunity for someone based on their age?

20 A. No, not at all.

21 MS. DiBIANCA: I don't have anything else.

22 MR. ANGLADE: Nothing else.

23 MS. DiBIANCA: Again, we're done.

24 (Deposition concluded at 3:35 p.m.)

